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7 Attorneys for Defendant
 ReconTrust Company, N.A.

10 IN THE UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

14 DEBORAH TAMBURRI,

15 Plaintiff,

16 vs.

17 SUNTRUST MORTGAGE, INC.; WELLS
 18 FARGO BANK, N.A.; U.S. BACK NATIONAL
 19 ASSOCIATION; MORTGAGE ELECTRONIC
 20 REGISTRATION SYSTEMS, INC.;
 RECONTRUST COMPANY, N.A.; and DOES 1-

21 Defendants.

Case No. CV-11-2899-JST (DMR)

**DECLARATION OF DAVID S. REIDY IN
 SUPPORT OF DEFENDANT
 RECONTRUST COMPANY, N.A.'S
 MOTION TO EXCLUDE EXPERT
 TESTIMONY OF ADAM J. LEVITIN AND
 THOMAS A. COX**

Hearing: August 15, 2013
 Time: 2:00 p.m.
 Location: 450 Golden Gate Avenue
 San Francisco, CA
 Courtroom: 9 – 19th Floor

Honorable Jon S. Tigar

Complaint Filed: April 13, 2011
 Trial Date: October 7, 2013

REED SMITH LLP

A limited liability partnership formed in the State of Delaware

1 I, David S. Reidy, declare,

2 1. I am an attorney with the law firm of Reed Smith LLP, counsel for defendant
3 ReconTrust Company, N.A. ("ReconTrust") in this lawsuit. I have personal knowledge of the
4 matters set forth herein and if called upon to testify thereto, I could and would do so competently.

5 2. On May 15, 2013, Plaintiff designated Thomas A. Cox ("Cox") as an expert witness
6 and served a report in which Cox addressed the June 2010 non-judicial foreclosure process initiated
7 against Plaintiff ("Cox Report"). Attached hereto as **Exhibit A** is a true and correct copy of the Cox
8 Report.

9 3. Attached hereto as **Exhibit B** is a true and correct copy of the court reporter's
10 transcript of the June 10, 2013 deposition of Cox in this action ("Cox Depo.").

11 4. On May 15, 2013, Plaintiff also designated Adam J. Levitin ("Levitin") as an expert
12 witness and served a report containing Levitin's opinions concerning the securitization and servicing
13 of Plaintiff's Loan and the June 2010 non-judicial foreclosure process initiated against Plaintiff.
14 Attached hereto as **Exhibit C** is a true and correct copy of Levitin's expert report ("Levitin Report").

15 5. Attached hereto as **Exhibit D** is a true and correct copy of the court reporter's
16 transcript of the June 11, 2013 deposition of Levitin in this action ("Levitin Depo.").

17 6. On May 29, 2013, ReconTrust designated Martin T. McGuinn ("McGuinn") as a
18 rebuttal expert witness to respond to the opinion testimony of Cox and Levitin as it pertained to the
19 June 2010 non-judicial foreclosure at issue. Attached hereto as **Exhibit E** is a true and correct copy
20 of the report of McGuinn's rebuttal expert report ("McGuinn Report").

21 7. Attached hereto as **Exhibit F** is a true and correct copy of the court reporter's
22 transcript of the June 13, 2013 deposition of McGuinn in this action ("McGuinn Depo.").

23 8. Attached hereto as **Exhibit G** is a true and correct copy of a June 8, 2010 Notice of
24 Default and Election to Sell Under Deed of Trust ("Notice of Default") regarding Plaintiff's real
25 property located at 2968 Sombrero Circle, San Ramon, California 94583 ("Property"), which was
26 recorded with the Contra Costa County Recorder's Office on June 9, 2010 as document number
27 2010-0114981-00. The Notice of Default is referred to and discussed extensively in the Levitin and
28 McGuinn reports.

By /s/ David S. Reidy
David S. Reidy